

**REMARKS**

Claims 1-16 are pending in the application. Claims 6-9 and 11 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claims 1-23 were rejected under 35 U.S.C. §102(b) as being anticipated by Gallup et al. Claims 17-23 have been canceled without prejudice towards re-filing them in a subsequent divisional application. Claims 6 and 11 have been amended. Reconsideration and reexamination of the application in view of the amendments as following remarks is respectfully requested.

Claims 6-9 and 11 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

In particular, the Examiner noted that “said instruction-memory pointer” and “said selected instruction word” of claim 6 lacked antecedent basis. Claim 6 has been amended to recite “an instruction-memory pointer” and “a selected instruction word.” With the amendments to claim 6, it is respectfully submitted that the rejection of claim 6 under 35 U.S.C. §112, second paragraph has been overcome.

The Examiner also noted that “said selected instruction word” in claim 7 lacked antecedent basis. Because claim 7 depends from claim 6, which now recites “a selected instruction word,” it is respectfully submitted that the rejection of claim 7 under 35 U.S.C. §112, second paragraph has been overcome.

The Examiner also noted that “said selected instruction word” in claim 8 lacked antecedent basis. Because claim 8 depends from claim 6, which now recites “a selected instruction word,” it is respectfully submitted that the rejection of claim 8 under 35 U.S.C. §112, second paragraph has been overcome.

The Examiner also noted that “said instruction-memory pointer” in claim 9 lacked antecedent basis. Because claim 9 depends from claim 6, which now recites “an instruction-memory pointer,” it is respectfully submitted that the rejection of claim 9 under 35 U.S.C. §112, second paragraph has been overcome.

The Examiner also noted that “said instruction-memory pointer” in claim 11 lacked antecedent basis. Claim 11 has been amended to recite “an instruction-memory pointer.” With the amendment to claim 11, it is respectfully submitted that the rejection of claim 11 under 35 U.S.C. §112, second paragraph has been overcome.

Claims 1-23 were rejected under 35 U.S.C. §102(b) as being anticipated by Gallup. Claims 17-23 have been canceled, rendering the rejection moot for those claims. With respect to claims 1-16, this rejection is respectfully traversed.

The present invention is directed to enabling data communication between a storage area network and another network implementing different protocols. At least one microsequencer system is employed to perform a translation between the two different protocols. The microsequencer system may include two or more microsequencers connected together to perform the translation using very long instruction words from an instruction memory for processing multiple instructions in parallel. Each microsequencer receives data and state information needed for translating the data.

There are significant and fundamental differences between Gallup and the present invention. Gallup is not concerned at all about enabling data communication between a storage area network and another network implementing different protocols, as in the present invention. Gallup is only directed to data processing within a single network -- fuzzy logic, neural networks, and other parallel, array oriented applications (see col. 1 lines 21-24). In Gallup, “all ports use the same basic transfer protocol” (see col. 24 lines 57-58). A “Key Feature” of Gallup is that it “Supports standard interface protocol” (see col. 21 line 47). Therefore, Gallup fails to disclose “[a] system for enabling communications between a first network having a first network protocol and a second network having a second network protocol,” as recited in claims 1 and 15.

The Examiner cites col. 119 lines 15-26 of Gallup as disclosing data communication between a storage area network and another network implementing different protocols, but it is respectfully submitted that the Examiner has misunderstood those lines. Section 5.8 of Gallup starts by saying: “Many fuzzy logic, neural networks, and other parallel, array oriented applications require a flexible data storage technique which allows an integrated circuit to select and store incoming data in a variety of patterns” (see col. 119 lines 15-18, emphasis added). This does not mean that the incoming data may have a variety of patterns, but rather it means quite the opposite. Incoming data, in the single network, single protocol environment of Gallup, is received in the same format but may be stored in a variety of patterns. This interpretation is confirmed in the next sentence, which states “It is desirable for the integrated circuit receiving the data, not the device transmitting the data, to select the appropriate bits of data and store them in the desired arrangement.” (Col. 119, lines 18-21, emphasis added.) The Applicants invite the Examiner to carefully re-examine this section of Gallup to understand its proper meaning.

Gallup also fails to disclose receiving state information indicative of a state of a first storage area network, as recited in claims 1 and 15. The Examiner cites col. 24 lines 55-62 and col. 29 lines 53-63 as disclosing “a second a second data port for receiving state information indicative of a state of a first storage area network selected from said first and second networks,” but these lines in Gallup do not mention anything about receiving state information indicative of a state of a first storage area network.

Furthermore, because Gallup is only directed to data processing systems for single networks, and because all ports in Gallup use the same basic transfer protocol, it should not be surprising that Gallup fails to mention anything about protocol conversions or translations. Gallup contains no disclosure at all related to “a microsequencer system configured to translate said input data on the basis of said state information, said microsequencer system translating said input data into corresponding data expressed in said second network protocol,” as recited in claim 1, or “an instruction memory . . . having a plurality of instruction words, . . . said instruction words being selected to translate input data from said first protocol to said second protocol,” as recited in claim 15.

The Examiner cites col. 43 lines 42-49 of Gallup as disclosing "a microsequencer system configured to translate said input data on the basis of said state information, said microsequencer system translating said input data into corresponding data expressed in said second network protocol," but these lines in Gallup say absolutely nothing about translating input data into corresponding data of a second protocol.

Because Gallup does not disclose all of the limitations of claims 1 and 15, the rejection of claims 1 and 15 under 35 U.S.C. §102(b) as being anticipated by Gallup is respectfully traversed. In addition, because claims 2-14 depend from claim 1, and claim 16 depends from claim 15, the rejection of those claims is traversed for the same reasons provided above with respect to claim 1.

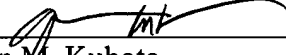
In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

If, for any reason, the Examiner finds the application other than in condition for allowance, Applicants request that the Examiner contact the undersigned attorney at the Los Angeles telephone number (213) 892-5752 to discuss any steps necessary to place the application in condition for allowance.

In the unlikely event that the transmittal letter is separated from this document and the Patent Office determines that an extension and/or other relief is required, Applicants petition for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 03-1952** referencing Docket No. 491442004500.

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Respectfully submitted,

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